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January 8, 2021

**VIA ECF**

Hon. John P. Cronan  
Daniel Patrick Moynihan  
United States Courthouse  
Courtroom: 20C  
500 Pearl St.  
New York, NY 10007-1312

Re: Delcid Orellana et al v. Yale Stone LLC et al,  
1:18-cv-12081-JGK

Your Honor,

This firm represents Plaintiff in the above-referenced matter. We write jointly with counsel for Defendants Yale Stone LLC, Yale Tile & Stone LLC, Antonio Dattolo, and Francesco Lorenti to respectfully request an extension of time to submit settlement materials to January 22, 2021.

The parties exchange fully executed copies of the settlement agreement. Plaintiff was provided with a check for deposit into an escrow account and, for the security of the settlement, require that it clears before the settlement can be final. As soon as the check clears, and before distribution of any funds, the parties are fully prepared to submit the settlement to the Court for approval.

We respectfully request until January 22, 2021 to submit settlement materials to the Court.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

*/s/ Clifford R. Tucker*  
Clifford R. Tucker  
MICHAEL FAILLACE & ASSOCIATES, P.C.  
Attorneys for the Plaintiffs

Cc: Via ECF

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Defendants' request is GRANTED. The parties shall submit a proposed settlement agreement for Court approval under *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015), by January 22, 2021.

SO ORDERED.

Date: January 8, 2021  
New York, New York



JOHN P. CRONAN  
United States District Judge